

The Environment Agency are supportive of the Council's approach to include the tighter water efficiency limits in policy. Up to date evidence from 2013 and 2015 identifies water resources to be an issue across the Severn Trent Water area, including Nottinghamshire and the wider East Midlands.

Within the 2013 report '[Water stressed areas – final classification](#)' the area of England serviced by Severn Trent Water is identified as an 'area of moderate water stress' in most scenarios. None the less, there are specific areas within the catchment which are shown to be under 'serious' water stress. This high level assessment is based upon individual assessments of waterbodies. Figure 2 shown below shows the specific waterbodies within the East Midlands that are classified as being under moderate, or severe, water stress.

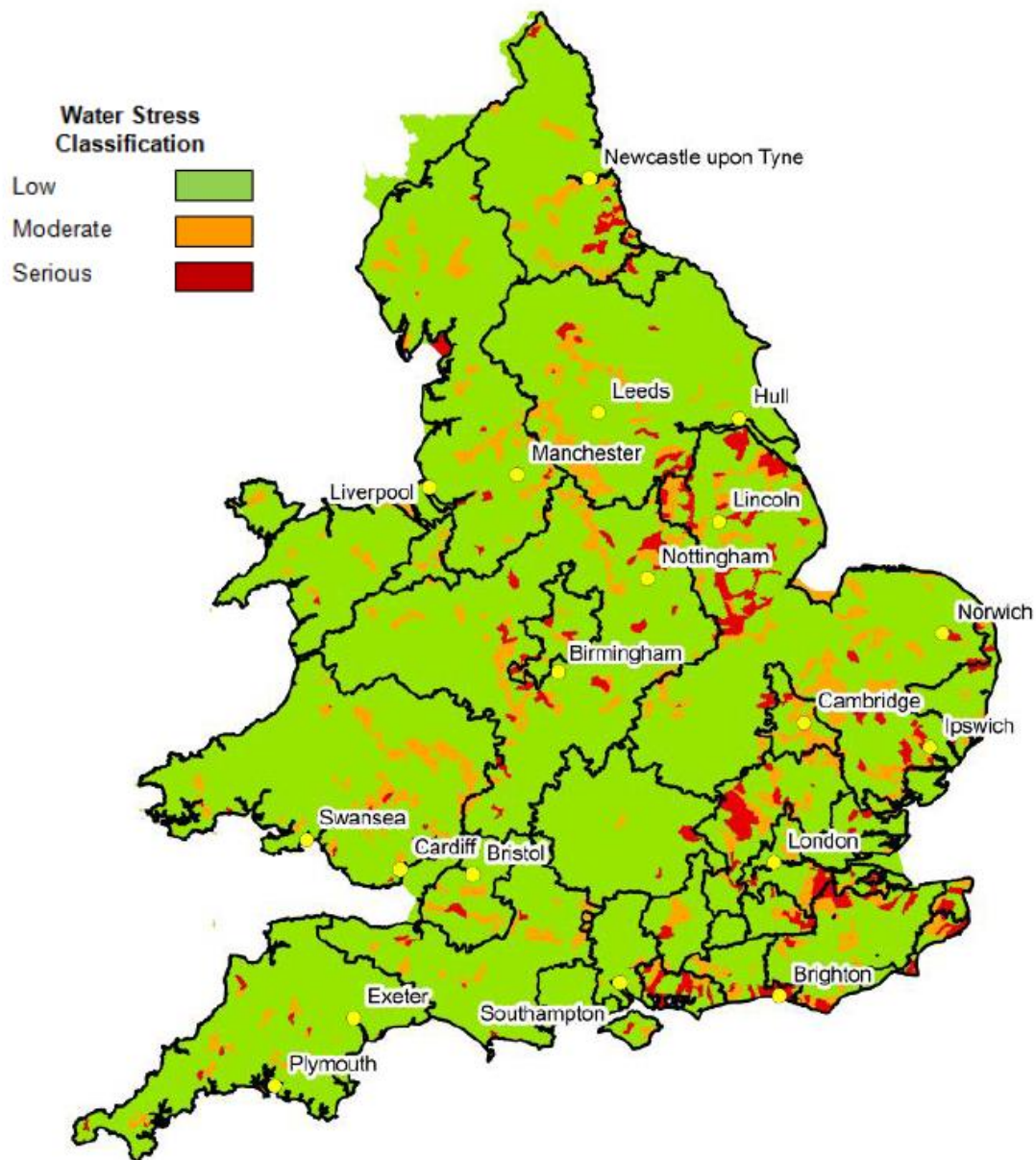


Figure 2: Map showing final water body stress classification at a water body scale.

Improving the way water resources are managed will make sure that there is enough good quality water for a healthier water environment, as well as securing supplies of water for people, businesses and agriculture. This links in with the wider D2N2 Strategic Economic Plan (SEP), and Severn Trent's Water Resources Management Plan, where water resources are identified as a key requirement for growth along with future challenges due to climate change and supply/demand.

The 2015 [Humber River Basin Management Plan](#) (RBMP) identifies water efficiency as one means of contributing to the overall objectives of the Water Framework Directive. The RBMP specifically identifies that one way in which 'Changes to natural flow and levels of water' can be managed is that 'Local government sets out local plan policies requiring new homes to meet the tighter water efficiency standard of 110 litres per person per day as described in Part G of Schedule 1 to the Building Regulations 2010' (pages 45-46).

Whilst the 2013 report '[Water stressed areas – final classification](#)' identifies the area of England serviced by Severn Trent Water as an 'area of moderate water stress', in most scenarios, there are specific areas where the situation is more significant. This high level assessment is based upon individual assessments of waterbodies. Figure 2 shown above highlights the specific waterbodies within the East Midlands that are classified as being under serious water stress.

As can be seen, the picture of water stress is not the same across the whole of Nottinghamshire or the East Midlands. As a result, it might be difficult to clearly 'justify' application of the tighter water efficiency standards across whole Local Plan areas. None the less, it is the Environment Agency's opinion that management of water resources needs to be seen over a wider spatial area – this approach is taken by both the Environment Agency and Water Companies. Applying separate standards across the area may also complicate the planning and development process and be counterproductive to wider objectives in terms of stimulating and supporting growth, whilst improving resilience to climate change and more efficiently using natural resources.

In terms of considering the impact on viability and housing supply, we've been previously asked to advise on whether or not the tighter standard of 110 litres/person/day will be viable. The [2014 Department for Communities and Local Government Housing Standards Review](#) identifies that delivery of the tighter Building Regulations requirement of 110 litres/person/day would only cost up to £9 per dwelling. The breakdown for individual dwellings is identified on *Table 26 – Water standards costs summary* (p27). The review goes on to propose 'a single standard set at 110 litres per day water use'.